

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

DOUGLAS HODGE,

Defendant.

)
)
)
) Criminal No. 19-10080-NMG
)
)
)
)

**DOUGLAS HODGE’S MOTION PURSUANT TO
28 U.S.C. § 2255 TO SET ASIDE HIS PLEA, IN PART, AND FOR
RE-SENTENCING ON THE REMAINING COUNT OF CONVICTION**

For the reasons explained in the accompanying memorandum of law, Defendant Douglas Hodge respectfully moves pursuant to 28 U.S.C. § 2255 for (i) an order setting aside his guilty plea to the charge of conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h); (ii) re-sentencing on the remaining count of conviction, conspiracy to commit mail and wire fraud and honest services mail and wire fraud, in violation of 18 U.S.C. § 1349; and (iii) such other and further relief as this Court may deem appropriate.

ORAL ARGUMENT REQUESTED

Pursuant to Local Rule 7.1(d), Mr. Hodge respectfully requests to be heard at oral argument on this motion.

Dated: May 1, 2020

Respectfully submitted,

By: /s/ Brien T. O'Connor

Brien T. O'Connor (BBO #546767)

brien.o'connor@ropesgray.com

Ezra D. Geggel (BBO# 691139)

ezra.geggel@ropesgray.com

ROPES & GRAY LLP

Prudential Tower

800 Boylston Street

Boston, MA 02199

Phone: (617) 951-7000

Joan McPhee (BBO #547869)

joan.mcphee@ropesgray.com

ROPES & GRAY LLP

1211 Avenue of the Americas

New York, NY 10036-8704

Phone: (212) 596-9000

Miranda Hooker (BBO #661569)

hookerm@pepperlaw.com

PEPPER HAMILTON LLP

125 High Street

Boston, MA 02110

Phone: (617) 204-5100

Attorneys for Defendant Douglas Hodge

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I, Brien T. O'Connor, hereby certify that counsel for Mr. Hodge conferred with counsel for the government regarding this motion.

/s/ Brien T. O'Connor
Brien T. O'Connor

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2020, I filed the foregoing with the United States District Court for the District of Massachusetts using the CM/ECF system, and caused it to be served on all registered participants via the notice of electronic filing (the "NEF").

Dated: May 1, 2020

/s/ Brien T. O'Connor